

Nina K. Markey, Esq. (Id. #047592005)
Jillian L. Szymonifka, Esq. (Id. #114492014)
LITTLER MENDELSON
A Professional Corporation
One Newark Center - Eighth Floor
Newark, New Jersey 07102
973.848.4700
Attorneys for Defendant

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

DAVID ROLLINS,

Plaintiff,

vs.

NATIONAL RAILROAD PASSENGER
CORPORATION d/b/a AMTRAK,

Defendant.

Civil Action No.3:16-cv-04542 (PGS)(TJB)

**DEFENDANT'S PROPOSED VERDICT
FORM**

Electronically Filed

Defendant National Railroad Passenger Corporation d/b/a Amtrak ("Defendant" or "Amtrak"), by and through its attorneys, submits the following Proposed Verdict Form.

/s/ Nina K. Markey, Esq.

Nina K. Markey, Esq.

Jillian L. Szymonifka, Esq.

LITTLER MENDELSON, P.C.

Three Parkway, 1601 Cherry Street, Suite
1400

Philadelphia, PA 19102.1321

Attorneys for Defendant,

National Railroad Passenger Corporation
d/b/a Amtrak

Dated: November 29, 2019

Question No. 1

Do you find by a preponderance of the evidence that Amtrak perceived Mr. Rollins as disabled?

Yes _____ No _____

If your answer to Question No. 1 is "No," then you must find in favor of Defendant on Plaintiff's perceived disability claim and proceed to Question No. 7.

If your answer to Question No. 1 is "Yes," then proceed to question No. 2.

Question No. 2

Do you find by a preponderance of the evidence that Amtrak terminated Mr. Rollins because of his perceived disability?

Yes _____ No _____

If your answer to Question No. 2 is "No," then you must find in favor of Defendant on Plaintiff's perceived disability claim and proceed to Question No. 7.

If your answer to Question No. 2 is "Yes," then proceed to question No. 3.

Question No. 3

What amount of money, if any, do you award Mr. Rollins for back pay?

ANSWER: \$_____

Proceed to Question No. 4.

Question No. 4

What amount of money, if any, do you award Mr. Rollins as compensation for injuries he suffered other than back pay?

ANSWER: \$_____

Proceed to Question No. 5

Question No. 5

Did the Defendant act with malice or reckless indifference to Mr. Rollin's protected rights?

Yes _____ No _____

If the answer is “yes,” proceed to Question No. 6. If the answer is “no”, proceed to Question No. 7.

Question No. 6

What amount of money, if any, do you award Mr. Rollins as punitive damages?

ANSWER: \$_____

Question No. 7

The presiding juror must sign and date a Verdict Sheet. Then the jurors should return to the Courtroom.

Date

Presiding Juror